

SCOTT N. SCHOOLS, SBN SC 9990  
 United States Attorney  
 LUCILLE GONZALES MEIS, SBN CO 15153  
 Regional Chief Counsel, Region IX,  
 Social Security Administration  
 ARMAND ROTH, SBN CA 214624  
 Special Assistant United States Attorney  
 California Bar Number 214624  
 333 Market Street, Ste 1500  
 San Francisco, CA 94105  
 415-977-8924  
 Fax: 415-744-0134  
 Email: Armand.Roth@ssa.gov  
 Attorneys for Defendant

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

MYRA A. MARTINELLI,

Plaintiff,

v.

MICHAEL ASTRUE<sup>1</sup>,  
 Acting Commissioner of  
 Social Security,

Defendant.

CIVIL NO. 06-cv-05845-CW

STIPULATION FOR EXTENSION AND  
~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED by the undersigned for the respective parties, subject to the approval of the Court, that the Defendant have an extension of 30 days in which to prepare and file her cross-motion for summary judgment. Defendant's response was due on April 27, 2007, pursuant to Civil L.R.16-5. Defendant's response is now due on May 29, 2007.

This is Defendant's first request.

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<sup>1</sup>

On February 12, 2007, Michael J. Astrue became the Commissioner of Social Security and should, therefore, be substituted for Commissioner Jo Anne B. Barnhart as Defendant in this action. 42 U.S.C. § 405(g); Fed. R. Civ. P. 25(d)(1).

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2 Dated: April 25, 2007 By: /s/ Richard Paul Zieman  
3 *(As authorized via telephone on April 25, 2007)*  
4 Richard Paul Zieman  
5 Attorney for Plaintiff

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7 KEVIN V. RYAN  
8 United States Attorney

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10 Dated: April 25, 2007 By: /s/ Armand Roth  
11 ARMAND ROTH  
12 Special Assistant United States Attorney

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14 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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16 Dated: 4/30/07

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 Attorneys for Defendant

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

MYRA A. MARTINELLI,	)	
	)	CIVIL NO. 06-cv-05845-CW
Plaintiff,	)	
	)	DECLARATION OF
v.	)	IN SUPPORT OF DEFENDANT'S REQUEST
	)	FOR EXTENSION OF TIME
JO ANNE B. BARNHART,	)	
Commissioner of	)	
Social Security,	)	
	)	
Defendant.	)	

I, Armand Roth, declare and state as follows:

1. I am an assistant regional counsel in the Social Security Administration Office of the Regional Chief Counsel, Region IX.
2. I am assigned to the above-captioned case.
3. This case was recently reassigned to me. Given my workload, including a number of district court briefs and two Ninth Circuit Court of Appeals briefs which are currently due in April and May 2007, I am respectfully requesting an extension for additional time of thirty days in which to prepare the Commissioner's cross-motion.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in San Francisco, California on April 25, 2007

/s/  
Armand Roth  
Assistant Regional Counsel

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